

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

**MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012**

Docket No. N2012-1

**AMERICAN POSTAL WORKERS UNION, AFL-CIO, NOTICE
OF INTENT TO CONDUCT ORAL CROSS EXAMINATION
(March 13, 2012)**

Pursuant to Rule 30(e)(3) of the Commission's Rules of Practice and Presiding Officer's Ruling No. N2012-1/5, the American Postal Workers Union, AFL-CIO (APWU) hereby gives notice that it intends to cross examine several Postal Service witnesses. APWU anticipates oral cross examination of:

1. Witness Williams (USPS-T-1). It is expected that such cross examination will be heavy
2. Witness Neri (USPS-T-4). It is expected that such cross examination will be light to moderate.
3. Witness Smith (USPS-T-9). It is expected that such cross examination will be moderate.
4. Witness Bradley (USPS-T-10). It is expected that such cross examination will be moderate.
5. Witness Martin (USPS-T-6). It is expected that such cross examination will be light to moderate.
6. Whiteman (USPS-T-12). It is expected that such cross examination will be light to moderate.
7. Witness Rosenberg (USPS-T-3). It is expected that such cross examination will be light.
8. Witness Bratta (USPS-T-5). It is expected that such cross examination will be light.

APWU's examination of each witness will address the prepared testimony of the witness, sponsored or related library references and designated written cross examination of the witness.

APWU expects that it's cross examination of each witness above will take place completely within the public domain. However, witnesses Rosenberg , Neri, Bratta, Martin, Bradley, Smith and Whiteman have sponsored or are associated with non-public library references. Thus, while not expected, questioning in a closed hearing may be required depending on responses provided during oral cross examination. APWU will promptly notify the Presiding Officer if and when this possibility becomes likely.

APWU does not have a present intent to conduct oral cross examination of Witnesses Masse (USPS-T-2), Mehra (USPS-T-7), Elmore-Yalch (USPS-T11), and LaChance (USPS-T-13), however APWU reserves the right to conduct follow-up cross examination of any witness as necessary.

Respectfully submitted,

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